

Re: N11 Code / National Suicide Hotline Improvement Act of 2018
WC Docket No. 18-336; CC Docket No. 92-105

December 05, 2018

The message following was sent as an email to NANC / NAOWG Members as input to the study the NAOWG is performing for a 3-digit TN to improve access for Suicide Prevention as required in the National Suicide Hotline Improvement Act of 2018:

RE: 611 Aging Process Discussion

NANC / NAOWG Members,

I understand you are nearing completion of your report for the FCC for recommendations on potential solutions for a 3-digit number for Suicide Prevention. After the NANC meeting yesterday, some expressed concern to me that 611 would be problematic because of a need for an extended aging period. While that would be true for 411, since it has evolved into a slang term and even listed in the Urban Dictionary ... that is not the case for 611. I offer the following for your consideration:

- When a business customer gives up their TN, extended aging would be normal and sometimes even longer periods would be needed. That because, since we don't know their customer base we can't contact them with the update... and we don't know where or if the TN has been published.
 - 611 has not been advertised in media or published (outside of direct correspondence by carriers to their customers) for probably 30 years. For the most part, people who know about 611, heard it from their carrier.
 - The Carriers using 611 are still in business and have well established communication paths (bills... text... direct mail advertising) which will reach the vast majority of the population that know about 611, as it is today. When combined with an intercept recording, once 611 has been shut down, during the aging process, it will ensure that the vast majority of a carrier's customers are aware that they need to call the already established and operational 800 number to reach that carrier's customer sales or service.
- When I worked on Splits and Overlays, we (the Telecom Industry) had proven customer education plans, adjusted by State Commissions for their specific demographics. While that wasn't about the reuse of specific numbers, to some degree those PSAs can factor in here as the shutdown of the current use of 611 occurs.

- Also... there will likely be a media campaign with the introduction of 611 for Suicide Prevention. Even if they don't see their carrier's notifications, it will raise awareness for those who are aware of the current use of 611... that 611 has a new purpose. Very likely, as part of the campaign a statement that "If you used 611 in the past for... " would likely be appropriate.
- Added to that, the National Suicide Prevention Lifeline (the target for the 3-digit number) is answered by an IVR ("Press 1 for the Veterans Crisis Line"), minimizing any callers advancing to a Clinician.

Therefore, I believe that a 3 to 6-month aging process would suffice. That said... if carriers take 611 out of service shortly after the decision to repurpose 611 for Suicide Prevention is made, there will likely be a year or more of aging during implementation planning and preparation.

Thanks for all of your due diligence to make 3-digit access for Suicide Prevention a reality. I would hope that carriers would see this as a PR opportunity as well as an opportunity to meet a vital societal need.

Joe Hurlbert

Excellence In Government – Senior Fellow
Solution Delivery – Infrastructure Engineering
Office of Information & Technology – IT Operations & Services
Department of Veterans Affairs